

PHILLIP A. TALBERT  
United States Attorney  
KIMBERLY A. SANCHEZ  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RAYLON THIJAY RANDLE,  
  
Defendant.

CASE NO. 1:21-CR-00246-DAD-BAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: June 14, 2023

TIME: 1:00 p.m.

COURT: Hon. Magistrate Judge Barbara A. McAuliffe

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on June 14, 2023.
2. By this stipulation, the parties move to vacate the status conference and set a change of plea hearing before the Honorable Ana de Alba for July 10, 2023 at 10:00 a.m., and to exclude time from calculation under the Speedy Trial Act between June 14, 2023, and July 10, 2023.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Initial discovery was provided to defendant on or about October 18, 2021, consisting of 114 Bates-stamped items including reports of investigation, body worn camera recordings, photographs, certified conviction records and a summary of defendant's criminal history.

1           b)     The government transmitted a plea offer to counsel for defendant on February 15,  
2     2022.

3           c)     The parties anticipate that the case will be ready for a change of plea hearing on  
4     July 10, 2023.

5           d)     Counsel for defendant believes that failure to grant the above-request would deny  
6     her the reasonable time necessary for effective preparation, taking into account the exercise of  
7     due diligence.

8           e)     Based on the above-stated findings, the ends of justice served by continuing the  
9     case as requested outweigh the interest of the public and the defendant in a trial within the  
10    original date prescribed by the Speedy Trial Act.

11          f)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12    et seq., within which trial must commence, the time period of June 14, 2023 to July 10, 2023,  
13    inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results  
14    from a continuance granted by the Court request on the basis of the Court's finding that the ends  
15    of justice served by taking such action outweigh the best interest of the public and the defendant  
16    in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: June 8, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ KIMBERLY A. SANCHEZ  
KIMBERLY A. SANCHEZ  
Assistant United States Attorney

Dated: June 8, 2023

/s/ CHRISTINA CORCORAN  
CHRISTINA CORCORAN  
Counsel for Defendant  
RAYLON THIJAY RANDLE

**ORDER**

IT IS SO ORDERED that the status conference set for June 14, 2023, is vacated. A change of plea hearing is set for **July 10, 2023, at 10:00 a.m. before District Judge Ana de Alba**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **June 8, 2023**

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE